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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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WALTER A. Y. H. CHINN, CLERK

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. CR03 00034	DAE
)		
Plaintiff,)	INDICTMENT	
)		
vs.)	Count 1: 21 U.S.C. § 846	
)	Count 2: 18 U.S.C. §	
ANGELINE GOMEZ,	(01))	922(g)(3) & 924(a)(2)	
BIENVENIDO AMBROCIO,	(02))	Count 3: 18 U.S.C. §§ 2,	
)	922(d)(3), & 924(a)(2)	
Defendants.)		
)		

INDICTMENT

COUNT 1

(21 U.S.C. § 846)

The Grand Jury charges that:

From a date unknown to the Grand Jury and continuing thereafter to January 15, 2003, in the District of Hawaii, defendants ANGELINE GOMEZ and BIENVENIDO AMBROCIO, did knowingly and intentionally conspire with each other to knowingly and

intentionally possess with intent to distribute and to distribute in excess of 50 grams of methamphetamine (including its salts, isomers, and salts of its isomers) a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Objects of the conspiracy

The objects of the conspiracy were to: (1) possess with intent to distribute, and (2) distribute, in excess of 50 grams of methamphetamine (including its salts, isomers, and salts of its isomers), a Schedule II controlled substance

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(18 U.S.C. §§ 922(g)(3) & 924(a)(2))

The Grand Jury further charges that:

On or about January 15, 2003, in the District of Hawaii, the defendant ANGELINE GOMEZ, then being an unlawful user of a controlled substance as defined in Title 21, United States Code, Section 802, to wit, methamphetamine, did knowingly possess in and affecting commerce a firearm, to wit, a .38 caliber revolver, model 38-1, with the serial number obliterated, manufactured by Smith & Wesson in the State of Massachusetts.

All in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 3

(18 U.S.C. §§ 2, 922(d)(3) & 924(a)(2))

The Grand Jury further charges that:

In or about some time between the summer of 2002 and October 2002, in the District of Hawaii, the defendant BIENVENIDO AMBROCIO did knowingly and intentionally aid and abet in the sale of a firearm, to wit, a Smith & Wesson .38 caliber revolver, model 38-1, to Angeline Gomez, while knowing and having reasonable cause to believe that Angeline Gomez was an unlawful user of methamphetamine, which is a controlled substance as defined in Title 21, United States Code, Section 802.

All in violation of Title 18, United States Code, Section 2, 922(d)(3), & 924(a)(2).

DATED: January 23, 2003, at Honolulu, Hawaii.

A TRUE BILL

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FOREPERSON, GRAND JURY

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UNITED STATES v. ANGELINE GOMEZ and BIENVENIDO AMBROCIO,
Cr. No. (Indictment)